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June 8, 2022

Honorable Rosemary Gambardella, U.S.B.J.
U.S. Bankruptcy Court
50 Walnut St., 3rd Floor
Newark, NJ 07102

Re: April Robinson, Debtor(s)
22-14158
Chapter 13
Proceeding: Order to Show Cause Why Case Should Not be
Dismissed for re: Failure to File Missing
Documents
Hearing Date: June 14, 2022 @ 10:00 am

Dear Judge Gambardella:

Please accept this letter in opposition to the above matter.

The debtor is seeking more time to file the balance of missing documents and the Chapter 13 Plan. The debtor is still in the process of gathering the required documents and preparing the balance of the petition. The debtor first met with my office and filed the petition on the day before a sheriff sale, right around the time of a holiday weekend and while my office was short staffed due to vacation. Therefore, there have been some impediments to getting the documents filed by the June 14th date.

However, it is anticipated that the balance of the petition and the Chapter 13 Plan will be filed within a period of 14 days.

For the foregoing reasons, I respectfully request that the court adjourn the hearing on the Order to Show Cause for a period of 14 days, or enter into an order giving the debtor until June 28, 2022 to file the missing documents.

Respectfully submitted,

/S/ HERBERT B. RAYMOND, ESQ.

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